

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HENRY SHATKIN, on behalf of himself and :
all others similarly situated, : No. 07 Civ. 7928 (PAC)
:
:
Plaintiff, :
:
:
v. :
:
:
THE BANK OF NEW YORK MELLON :
CORPORATION and THE BANK OF NEW :
YORK, N.A., :
:
:
Defendants. :
-----x

DECLARATION OF IMTIAZ A. SIDDIQUI

I, Imtiaz A. Siddiqui, submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a duly licensed attorney at law, admitted to the Bar of New York. I am associated with the law firm of Lovell Stewart Halebian LLP in New York, New York. (“LSH”). LSH, along with other law firms, represents Henry Shatkin (“Plaintiff”) in this class action against The Bank of New York Mellon Corporation and Bank of New York (collectively, “BONY” or “Defendants”).
2. I am submitting this declaration in support of the Plaintiff’s Opposition to Defendant’s Motion to Dismiss or in the Alternative, to Stay.
3. A true and correct copy of Stipulation and Order Authorizing Sale of Securities, *In re Sentinel Mgmt. Group, Inc.*, No. 07-B-14987 (Bankr. N.D. Ill. Dec. 13, 2007) is attached hereto as Exhibit A.

4. A true and correct copy of a Trustee's Consolidated Response to Defendants' Motions to Dismiss, *Grede v. Bloom*, No. 07-AP-00981 (Bankr. N.D. Ill. Jan. 10, 2008) (adversary proceeding filed in connection with *In re Sentinel Mgmt. Group, Inc.*, No. 07-B-14987), is attached hereto as Exhibit B.

5. A true and correct copy of Complaint, *Grede v. Bank of New York*, No. 08-AP-00127 (Bankr. N.D. Ill. Mar. 3, 2008) (adversary proceeding filed in connection with *In re Sentinel Mgmt. Group, Inc.*, No. 07-B-14987) is attached hereto as Exhibit C.

6. A true and correct copy of Letter from Eric A. Bloom, President & CEO, Sentinel Management Group, Inc., to Joseph Ciaccirelli, Vice President, Bank of New York (Mar. 14, 1997) (regarding Customer Segregated Funds Account I) is attached hereto as Exhibit D.

7. A true and correct copy of Letter from Eric A. Bloom, President & CEO, Sentinel Management Group, Inc., to Joseph Ciaccirelli, Vice President, Bank of New York (Mar. 14, 1997) (regarding Customer Segregated Funds Account II) is attached hereto as Exhibit E.

8. A true and correct copy of Letter from Eric A. Bloom, President & CEO, Sentinel Management Group, Inc., to Joseph Ciaccirelli, Vice President, Bank of New York (Mar. 14, 1997) (regarding Customer Segregated Funds Account III) is attached hereto as Exhibit F.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 28, 2008

Respectfully submitted,

/s/ Imtiaz A. Siddiqui
IMTIAZ A. SIDDIQUI (IS 4090)
LOVELL STEWART HALEBIAN LLP
500 Fifth Avenue, Suite 5800
New York, New York 10110
Telephone: 212-608-1900
Facsimile: 212-719-4677